

REMARKS

In the Office Action, the Examiner rejected claims 1-59. By the present response, the Applicants amended claims 1, 15-18, 20, 27, 28, 32, 33, 34, 37-41, 43-47, 51, and 53-56 to clarify certain features and expedite allowance of the present application. No new matter has been added. In view of the foregoing amendments and following remarks, the Applicants respectfully request reconsideration and allowance of all pending claims 1-59.

As discussed in the following remarks, the Applicants also request the Examiner consider, and indicate such consideration in the next Office Action, the references submitted in the Supplemental Information Disclosure Statement accompanying the present Amendment and Response and, also, the references previously submitted in a Supplemental Information Disclosure Statement mailed on August 8, 2002.

Objections to the Drawings Under 37 C.F.R. § 1.83(a)

The Examiner objected to the drawings for failing to show every feature of the invention specified in the claims. Specifically, the Examiner alleged that the horizontal mount structure recited in claim 12 and the angular lock assembly recited in claim 13 were not shown in the drawings. Regarding the claimed horizontal mount structure, the Applicants respectfully direct the Examiner to Figure 6 and the corresponding description on Page 17, Paragraph 1 and Page 19, Paragraph 2 of the present application. Regarding the claimed angular lock assembly, the Applicants respectfully direct the Examiner to Figures 4-6 and the corresponding description on Page 13, Paragraph 2 of the present application. The Applicants believe these illustrations and descriptions fully support the claim language used in the foregoing claims. Accordingly, the Applicants request the Examiner to withdraw the objections to the drawings under 37 C.F.R. § 1.83(a).

Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 1-15, 17, 18, 20-26, 28-47, 49-55, and 57-59 under 35 U.S.C. §102(b) as being anticipated by Karidis (US. 6,006,243).

Anticipation under section 102 can be found only if a single reference shows exactly what is claimed. *Titanium Metals Corp. v. Banner*, 778 F.2d 775, 227 U.S.P.Q. 773 (Fed. Cir. 1985). For a prior art reference to anticipate under section 102, every element of the claimed invention must be identically shown in a single reference. *In re Bond*, 910 F.2d 831, 15 U.S.P.Q.2d 1566 (Fed. Cir. 1990). To maintain a proper rejection under section 102, a single reference must teach each and every limitation of the rejected claim. *Atlas Powder v. E.I. du Pont*, 750 F.2d 1569 (Fed. Cir. 1984). Accordingly, the Applicants need only point to a single element not found in the cited reference to demonstrate that the cited reference fails to anticipate the claimed subject matter. The prior art reference also must show the *identical* invention “*in as complete detail as contained in the ... claim*” to support a *prima facie* case of anticipation. *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 U.S.P.Q. 2d 1913, 1920 (Fed. Cir. 1989).

Independent Claim 1:

As discussed below, the claimed technique *does* have patentably distinct elements not found in the reference cited by the Examiner. For example, independent claim 1 recites, *inter alia*, a component housing having first, second, and *third* sections *rotatably coupled* together, and a display rotatably coupled to the component housing. (Emphasis added). In contrast, the cited reference discloses a foldable personal computer having, at most, only two sections and a display. *See* Karidis, Fig. 4. Specifically, Karidis discloses a computer unit 70 having a display section 72, a base section 74, and a back section 76, which are coupled via hinges 78 and 80. *See* Karidis, Figs. 4-5; col. 9, lines 13-37. The Karidis reference is absolutely devoid of any teaching or suggestion of a *third* section *rotatably coupled* to any of the display section 72, the base section 74, or the back section 76. Accordingly, the Karidis reference fails to teach each and every element of the present independent claim 1. Moreover, the remaining references, including

those submitted in the Supplemental Information Disclosure Statement accompanying the present Amendment and Response, all fail to teach or suggest the foregoing.

In view of these missing elements, independent claim 1 and its respective dependent claims are believed to be patentable over the prior art. Applicants respectfully request the Examiner withdraw the rejection under 35 U.S.C. § 102 and allow the foregoing claims.

Independent Claim 20:

Independent claim 20 recites, *inter alia*, “a housing comprising at least a *portion rotatable to an upright orientation*” and “an *intermediate member* rotatably coupled to the display at a first end and rotatably coupled to the at least portion at a second end.” (Emphasis added). As argued above, the cited reference discloses a computer unit 70 having only a display section 72, a base section 74, and a back section 76, which are coupled via hinges 78 and 80. *See* Karidis, Figs. 4-5; col. 9, lines 13-37. As emphasized above, claim 20 has at least one additional component not found in the Karidis reference. The cited reference does not teach a portion rotatable to an upright orientation *and* an intermediate member, as recited in claim 20. Accordingly, the cited reference fails to disclose each and every element recited in the instant claim. Moreover, the remaining references, including those submitted in the Supplemental Information Disclosure Statement accompanying the present Amendment and Response, all fail to teach or suggest the foregoing.

In view of these missing elements, independent claim 20 and its respective dependent claims are believed to be patentable over the prior art. Applicants respectfully request the Examiner withdraw the rejection under 35 U.S.C. § 102 and allow the foregoing claims.

Independent Claim 32:

Independent claim 32 recites, *inter alia*, “a body comprising at least *four* rotatably coupled sections” that comprise “at least two component housing sections... and at least one display housing.” (Emphasis added). As argued above, the cited reference does not disclose the

four sections, as recited in the instant claim. Applicants reiterate that the cited reference discloses, at most, a *three sections*, i.e., a display section 72, a base section 74, and a back section 76 coupled via hinges 78 and 80. *See* Karidis, Figs. 4-5; col. 9, lines 13-37. Accordingly, the cited reference fails to disclose each and every element recited in the instant claim. Moreover, the remaining references, including those submitted in the Supplemental Information Disclosure Statement accompanying the present Amendment and Response, all fail to teach or suggest the foregoing.

In view of these missing elements, independent claim 32 and its respective dependent claims are believed to be patentable over the prior art. Applicants respectfully request the Examiner withdraw the rejection under 35 U.S.C. § 102 and allow the foregoing claims.

Independent Claim 43:

Independent claim 43 recites, *inter alia*, a method comprising “rotatably coupling a *plurality of panels*” and “rotatably coupling a *display panel* support structure to one of the plurality of panels *via an intermediate member*.” (Emphasis added). As argued above, the cited reference merely discloses *three sections (not four)*, i.e., a display section 72, a base section 74, and a back section 76 coupled via hinges 78 and 80. *See* Karidis, Figs. 4-5; col. 9, lines 13-37. Accordingly, the cited reference fails to disclose each and every element recited in the instant claim. Moreover, the remaining references, including those submitted in the Supplemental Information Disclosure Statement accompanying the present Amendment and Response, all fail to teach or suggest the foregoing.

In view of these missing elements, independent claim 43 and its respective dependent claims are believed to be patentable over the prior art. Applicants respectfully request the Examiner withdraw the rejection under 35 U.S.C. § 102 and allow the foregoing claims.

Independent Claim 51:

Independent claim 51 recites, *inter alia*, a method comprising “geometrically orienting at least *four sections* of the multi-configurable computing device via at least *three independently pivotable joints*.” (Emphasis added). As argued above, the cited reference merely discloses *three sections (not four)*, i.e., a display section 72, a base section 74, and a back section 76. See Karidis, Figs. 4-5; col. 9, lines 13-37. Moreover, the cited reference discloses only two joints (not three), i.e., hinges 78 and 80. See *id.* Accordingly, the cited reference fails to disclose each and every element recited in the instant claim. Moreover, the remaining references, including those submitted in the Supplemental Information Disclosure Statement accompanying the present Amendment and Response, all fail to teach or suggest the foregoing.

In view of these missing elements, independent claim 51 and its respective dependent claims are believed to be patentable over the prior art. Applicants respectfully request the Examiner withdraw the rejection under 35 U.S.C. § 102 and allow the foregoing claims.

Rejections Under 35 U.S.C. § 103

The Examiner rejected dependent claims 16, 19, 27, 48, and 56 under 35 § U.S.C. §103(a) as being unpatentable over Karidis in view of various other patents, including Sweere et al. (U.S. Patent No. 6,015,120) and Stern (U.S. Patent No. 5,260,884). Applicants respectfully traverse the Examiner’s rejections.

In the present Office Action, the Examiner acknowledged that the primary Karidis reference does not teach or suggest certain features recited in dependent claims 16, 19, 27, 48, and 56. The Examiner relied on the Sweere et al. and Stern references solely for the purpose of rejecting these dependent claims, but not for a rejection of the independent claims 1, 20, 32, 43, and 51. The foregoing references absolutely fail to obviate the deficiencies of Karidis, as discussed in detail above. Accordingly, the foregoing dependent claims are believed to be patentable over the cited references and in condition for allowance.

The Applicants further stress that the references submitted in the Supplemental Information Disclosure Statement accompanying the present Amendment and Response, alone or in combination with the remaining references of record, all fail to teach or suggest elements set forth in each of the independent claims 1, 20, 32, 43, and 51 in their present form.

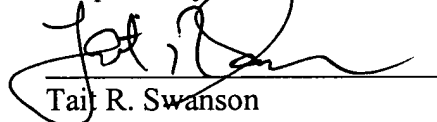
Accordingly, independent claims 1, 20, 32, 43, and 51 and their respective dependent claims are believed to be patentable over the prior art. Applicants respectfully request the Examiner withdraw the rejections under 35 U.S.C. § 103 and allow the pending claims.

Conclusion

The Applicants respectfully submit that all pending claims should be in condition for allowance. However, if the Examiner believes certain amendments are necessary to clarify the present claims or if the Examiner wishes to resolve any other issues by way of a telephone conference, the Examiner is kindly invited to contact the undersigned attorney at the telephone number indicated below.

Date: February 19, 2003

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Tait R. Swanson', is written over a horizontal line.

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